



## CALIFORNIA TEACHERS ASSOCIATION

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October 2, 2002

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428 J Street, Suite 800  
Sacramento, CA 95814

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**Re: Adoption of Amended Regulation 18531.7  
Agenda Item 3  
October 4, 2002 Commission Meeting**

Dear Chairman and Commissioners:

I am writing on behalf of the California Teachers Association to urge the Commission to adopt the proposed Regulation 18531.7 as proposed in the petition filed by CTA, SEIU, CTA and the California Labor Federation.

If the Commission adopts the proposed changes to the definition of member in subdivision (a)(2), all of our members will be recognized as members for purposes of Government Code section 85312. We certainly have appreciated the time and effort given by the Commission and its staff to these critical issues to our Association.

We do have one remaining concern on the staff's recommendation on subdivision (f) concerning the reporting of payments made for membership communications which are paid by the organization's sponsored committee. As we understand the staff proposal, it would require the identification on the report of the candidates or ballot measures which are the subject of the membership communications.

As we stated in our previous letter to the Commission, it should not matter whether membership communications are paid from general funds or the Association's sponsored PAC funds. We understand that PAC funds have to be fully accounted for and included on a PAC report in order to ensure accurate reporting of a PAC's total receipts and expenditures. However, we do not agree that the law authorizes a regulatory requirement for the disclosure of the content of a membership communication; in fact, it would be inconsistent with both the letter and the spirit of Section 85312.

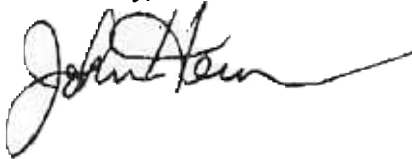
CAROLYN DOGGY  
Executive Director

Karen Getman  
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We are also concerned with the potential reporting burdens particularly those placed on the local associations and their PACs if they were required to comply with such a requirement. We would therefore urge the Commission to reject the staff's recommendation on this issue and to adopt our proposed changes to subdivision (f).

Again we thank you for your time and consideration of our views.

Sincerely,

A handwritten signature in dark ink, appearing to read "John Hein", with a long, sweeping horizontal line extending to the right.

John Hein  
Associate Executive Director  
Government Relations  
California Teachers Association